



May 6, 2025

Via Electronic Mail

**RE: PowerOptions' Comments on the DPU & EFSB's Intervenor Support Grant Program Straw Proposal**

To whom it may concern,

I am writing on behalf of PowerOptions, a nonprofit energy-buying consortium and trusted advisor to nonprofits and the public sector in Massachusetts as well as across New England. With over 500 Members, both large and small, our collective strength yields optimal energy pricing and stability for our entire Membership. We are mission-driven with a primary focus on reducing the cost, carbon, and complexity of energy for our Members with programming such as energy procurement, energy sustainability analytics, solar and storage, and clean transportation.

We commend the Executive Office of Energy and Environmental Affairs ("EEA"), the Office of Environmental Justice and Equity ("OEJE"), the Energy Facilities Siting Board ("EFSB"), the Department of Public Utilities ("DPU"), and the Department of Energy Resources ("DOER") for their diligent efforts to promulgate regulations that implement the Commonwealth's 2024 Climate Law. These efforts are critical to enabling the more timely and efficient integration of clean energy resources onto the grid. In particular, we express strong support for the establishment of regulations to create an Intervenor Support Grant Program, which will empower more Massachusetts-based entities to participate meaningfully in regulatory proceedings.

We commend each of the regulatory agencies for their thoughtful development of the straw proposal and their proactive engagement with stakeholders prior to the promulgation of formal regulations. In the spirit of collaboration and in recognition of this valuable opportunity for input, we respectfully submit the following recommendations for consideration in the drafting of formal regulations:

- Clarify whether limited intervenors are eligible to receive funding through the Intervenor Support Grant Program or explicitly allow their inclusion if this was the original intent.
- Incorporate language that enables organizations or entities that provide energy services to, represent, or advocate on behalf of eligible groups—including housing authorities, community-based nonprofits, and small municipalities whose constituencies include, but are not limited to, low- or moderate-income households, historically marginalized communities, or geographically defined residential populations—to qualify for the Intervenor Support Grant Program.

A more detailed explanation of these recommendations is provided at the conclusion of this letter.

Thank you for your leadership and commitment to Massachusetts' climate goals as well as to those with limited resources. We welcome the opportunity to collaborate and support the state and its residents in overcoming challenges and achieving meaningful progress. Please feel free to reach out with any questions or to continue this conversation at Sophia Gosselin-Smoske ([sgosselinsmoske@poweroptions.org](mailto:sgosselinsmoske@poweroptions.org)).



Thank you for your time,

A handwritten signature in black ink, appearing to read "Sophia Gosselin-Smoske". The signature is fluid and cursive, with the first name "Sophia" being the most prominent.

Sophia Gosselin-Smoske  
Regulatory and Policy Analyst  
PowerOptions





***What additional eligibility criteria should be considered, if any, to determine allocation of funding to prospective grantees?***

As stated in the straw proposal presentation, eligible entities for the Intervenor Support Grant Program include:

- *“Organizations and entities that advocate on behalf of residential customers defined geographically or based on specific shared interests”*
- *“Organizations and entities that advocate on behalf of low- or moderate-income residential populations, residents of historically marginalized or overburdened and underserved communities”*
- *“Governmental bodies, including regional planning agencies, federally recognized Tribes, state-acknowledged Tribes or state-recognized Tribes”*
- *“A group of individuals that may be specifically and substantially affected by a proceeding”*

In the specific case of organizations like PowerOptions, while we do not serve residential populations directly, we support them indirectly by working with nonprofits, municipalities, and public and private affordable housing organizations that do. With over 500 Members, 55.5% of our Membership is located within an environmental justice community and 31.7% directly serve disadvantaged communities.

Although the current eligibility language could be interpreted to include organizations such as ours, it may also be read more narrowly, potentially excluding energy consultants and advocates who represent these targeted groups. As a nonprofit ourselves, we remain resource-constrained, yet our mission—to reduce the cost, carbon, and complexity of energy—compels us to advocate on behalf of our Members, many of whom lack the capacity, expertise, or time to engage in DPU or EFSB proceedings. We therefore recommend the addition of language explicitly including organizations or entities that provide energy services to, represent, or advocate on behalf of eligible groups—including housing authorities, community-based nonprofits, and small municipalities whose constituencies include, but are not limited to, low- or moderate-income households, historically marginalized communities, or geographically defined residential populations. This clarification would empower organizations like PowerOptions to intervene on behalf of the communities we serve, allowing our Members to remain focused on their core missions while still having a voice in critical regulatory processes.

Additionally, the presentation also states that, *“Only parties that have been granted intervenor status in a DPU or EFSB proceeding are eligible to receive grant awards.”* We urge the agencies to clarify that limited intervenors are eligible for Intervenor Support Grant funding. Such a clarification would serve the interests of both the DPU and EFSB by recognizing that limited intervention entails lower participation costs, thereby enabling a broader range of stakeholders to access and benefit from the funding pool.